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December 14, 2012

VIA ECF & FACSIMILE

Hon. Joseph A. Dickson
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal
Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Nike, Inc. v. Eastern Ports Custom Brokers, Inc., et al.*
Civil Action No. 11-CV-4390 (CCC)(JAD)

Dear Magistrate Judge Dickson:

We represent Plaintiff, NIKE, Inc. (hereinafter "Nike") in the above-referenced matter. We, jointly with counsel for Defendants, write to request that the deadlines currently set for fact discovery and expert discovery be extended for two months.

Specifically, the parties propose the following discovery deadlines:

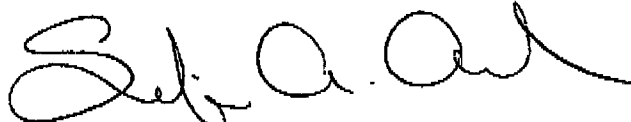
New Fact Discovery deadline:	March 15, 2013
New Affirmative Expert Reports:	April 15, 2013
New Responding Expert Reports:	May 15, 2013
Expert Discovery deadline:	June 28, 2013

The parties are making this request because in light of the recent hurricane and the upcoming holidays, the parties foresee difficulties in completing discovery within the current deadlines, and the aforementioned extensions would allow for discovery to be completed.

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Please let us know if you have any questions and we thank Your Honor for Your attention to this matter.

Respectfully submitted,


Safia A. Anand

cc: Michael Holihan (via Email)
Stephanie Boomershine (via Email)
Carl R. Soller, Esq. (via Email)
Heng Weng, Esq. (via Email)
David Donald Gabel (via Email)
Patrick F. Lennon (via Email)

SO ORDERED

s/Joseph A. Dickson
Joseph A. Dickson, U.S.M.J.

Date: 12/14/12